

**AFFIDAVIT OF SPECIAL AGENT ZACHARY MITLITSKY
IN SUPPORT OF DETENTION**

I, Zachary A. Mitlitsky, having been sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”). I make this affidavit in support of the government’s motion to detain pending trial **JONATHAN VAUGHAN a/k/a “Jonathan Vaughn,” a/k/a “ASON.”**

2. I have been employed as a Special Agent since August 2020 and am currently assigned to the Office of the Special Agent in Charge (SAC), Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 8, Title 18, and Title 19 of the United States Code (“USC”). I am a graduate of the Federal Law Enforcement Training Center (“FLETC”) in Glynco, Georgia, where I received training to become a Special Agent; specifically, I have received certifications from the Criminal Investigator Training Program in February 2021 and from the HSI Special Agent Training Program in May 2021. I received training relating to the trafficking in persons, including sex trafficking, and other offenses.

3. I am currently assigned to the Human Smuggling and Trafficking Unit, where I investigate interstate and international human trafficking matters. I have participated in investigations of human trafficking, human smuggling, drug trafficking, financial crimes, and related offenses, which have included the executions of arrests and search warrants. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I debrief defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in

Massachusetts, nationally, and abroad.

4. The facts in this affidavit come from my personal observations and review of records, my training and experience and that of other investigators assisting on this case, information obtained from the review of police reports, information obtained from interviews of witnesses, and other sources of information gathered through my investigation. This affidavit is intended in support of the government's motion for detention and does not set forth all of my and the other investigators' knowledge about this matter.

BACKGROUND OF THE INVESTIGATION

5. In the summer of 2021, Homeland Security Investigations ("HSI") and the Barnstable Police Department began an investigation into VAUGHAN and his involvement in sex trafficking in Cape Cod and other areas of Massachusetts. Since that time, investigators have spoken with a number of women who have been the victims of sex trafficking by VAUGHAN. The full identities of these women are known to law enforcement but are not being disclosed in this affidavit at this time. To the extent I describe in this affidavit the details of the conversations between investigators and these victims, such details are merely summaries, and not verbatim descriptions, of the conversations and are not necessarily fully inclusive of everything discussed between the victims and law enforcement investigators.

6. Based on my training and experience, I am aware that 18 U.S.C. § 1591 makes it a federal offense for any person to knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize or solicit by any means a person – or benefit financially or by receiving anything of value from participating in a venture, which has engaged in said acts – in or affecting interstate commerce, 1) knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person

to engage in a commercial sex act; or, 2) knowing that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act. I am also aware that pursuant to 18 U.S.C. § 2421, it is a federal offense for a person to knowingly transport an individual in interstate commerce, with intent that such individual engage in prostitution or any sexual activity. I am further aware that 21 U.S.C. § 841(a)(1) makes it a federal offense to knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance.

7. I believe that certain patterns emerge which are useful for understanding sex trafficking. Sex trafficking is a financially motivated crime. Human trafficking, a widespread and highly profitable crime, generates an estimated \$150 billion worldwide per year.¹ Traffickers often seek out and exploit victims who are the most vulnerable. These vulnerabilities often include, but are not limited to, substance dependency; homelessness or issues with a stable home; financial instability or debt; intellectual disabilities; limited English language skills; undocumented immigration status; and issues with the criminal justice system or prior periods of incarceration.² Sex traffickers do not just recognize these vulnerabilities – they prey on them – typically by force, fraud, or coercion on multiple levels. They may offer protection and promise of opportunity, including fraudulent job offers or feigned romances or promises of shelter, food, material possessions, transportation, drugs, gang membership, recovery from substance dependency, money, tattoos or education.³ They coerce victims to provide commercial sex through a

¹ See *2021 Trafficking in Persons Report – United States Department of State* <https://www.state.gov/reports/2021-trafficking-in-persons-report> (last visited April 4, 2022) and *U.S. Department of Homeland Security – Countering Human Trafficking: Year in Review (October 2020 to September 2021)* at <https://www.dhs.gov/sites/default/files/2022-02/CCHT%20Annual%20Report.pdf> (last visited April 7, 2022).

² See generally *2020 Federal Human Trafficking Report* at <https://traffickinginstitute.org/wp-content/uploads/2022/01/2020-Federal-Human-Trafficking-Report-Low-Res.pdf> (last visited April 7, 2022).

³ *Id.*

combination of physical and sexual violence, threats of physical harm to their families or other close relations, psychological harm, financial or debt-related threats, threats of deportation or arrest, theft of disability benefits, manipulation of substance use disorder, or withdrawal of housing security or other material support.⁴ Unfortunately, many victims of human trafficking do not leave their situation because the trafficker's force, fraud or coercion, and fear associated with it, compels the victims to remain in an exploitative situation.⁵ Often these victims are already involved in the criminal justice system and may hesitate to turn to law enforcement for assistance due to their own pending cases, outstanding warrants, or lack of faith in law enforcement. The victims are fearful to report what has happened to them because they are humiliated by or ashamed of what they were forced to do, afraid of being condemned by those who believe they were willing participants and, of course, afraid of being judged. Perhaps, as a result, commercial sex – which is usually illegal – often takes place out in the open on the internet. Traffickers can post and promote the victims on websites, which enables them to find “johns” in differing cities and states and can more easily evade law enforcement because the activities typically are off the street, in hotel rooms easily booked on websites like Priceline or Expedia.

8. In addition, pimps may view sex trafficking as more profitable than other illegal markets. While an individual can sell a drug or a gun once, a pimp can profit from the same trafficking victim many, many times, even in the same evening. While indeed the pandemic somewhat slowed the number of human trafficking prosecutions in 2020, according to an analysis of data from the United States National Human Trafficking Hotline, reports of human trafficking

⁴ See *Department of Justice's National Strategy to Combat Human Trafficking – January 2022* at <https://www.justice.gov/opa/press-release/file/1467431/download> (last visited April 5, 2022).

⁵ See generally *December 2021 – The White House National Action Plan to Combat Human Trafficking* at <https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf> (last visited April 7, 2022).

in 2020 were notably consistent with years prior.⁶ Put another way, human trafficking appears to be pandemic proof.⁷ In 2020, nearly 7,648 situations of sex trafficking and 10,836 victims of sex trafficking were identified⁸ amounting to on average nearly 21 identifiable situations of sex trafficking and 30 identifiable victims of sex trafficking per day in the United States. Like many other industries in 2020, human trafficking proved highly adaptable. For example, online recruitment increased 22% while victims from some recruitment sites such as strip clubs (-46%), foster homes (-70%), and schools (-38%) decreased dramatically during lockdowns.⁹ In fact, recruitment of potential victims on Facebook and Instagram saw an increase over the previous year of 125% and 95%, respectively.¹⁰ According to the 2020 Federal Human Trafficking Report, Facebook was the most frequently used website or application in public sources used for online victim recruitment in active sex trafficking cases in both 2019 and 2020.¹¹ Indeed, recruitment and keeping track of their victims over the internet, like the posting of advertisements of commercial sex on the internet, allows sex traffickers to evade law enforcement detection.

⁶ As detailed below, I am aware that VAUGHAN was in custody for much of 2020 after his September 2019 arrest. That said, statistics and trends from 2020 are the most recent ones available. Based upon my training, experience and knowledge of the investigation into VAUGHAN's trafficking activities, I believe that VAUGHAN's pre-pandemic engagement in and recruitment of women for sex trafficking is similar to what occurred nationally in 2020. What is more, I believe the pandemic-related trends reflected in these statistics continued into 2021, that is, once VAUGHAN was released from custody.

⁷ See *Human Trafficking Trends in 2020* by Polaris (a data driven nonprofit non-governmental organization that works to combat and prevent sex and labor trafficking in North America) at <https://polarisproject.org/wp-content/uploads/2022/01/Human-Trafficking-Trends-in-2020-by-Polaris.pdf> (last visited April 5, 2022).

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ See <https://www.traffickinginstitute.org/wp-content/uploads/2021/06/2020-Federal-Human-Trafficking-Report-Low-Res.pdf> (last visited April 7, 2022).

THE DEFENDANT – JONATHAN VAUGHAN, a/k/a “ASON”

9. The investigation revealed that VAUGHAN, a/k/a “ASON” has engaged in sex trafficking dating back to at least 2019. During that time, he systematically preyed on women throughout Massachusetts, particularly in Boston and on Cape Cod. I am aware that more recently, that is, from at least late spring/early summer of 2021 until his October 13, 2021 arrest on state charges, VAUGHAN maintained a tent at Massachusetts Avenue and Melnea Cass Boulevard (hereinafter, “Mass. and Cass”) which he used as a hub for distributing drugs and recruiting and trafficking women. More specifically, VAUGHAN permitted his victims of sex trafficking to stay in and to bring “dates” back to his tent so long as he received the proceeds of the commercial sex acts that the women engaged in at VAUGHAN’s direction.

10. I am aware that VAUGHAN recruited his victims in person, including in Downtown Crossing and in and around Mass. and Cass in Boston. VAUGHAN also recruited women over the internet, particularly over Facebook. According to records received from Facebook, VAUGHAN has been sending Facebook messages to women as a method of recruitment dating back to at least 2015. VAUGHAN recruited victims to work for him and to engage in commercial sex acts with paying customers with promises of a better life, including, financial stability, nice hotels and clothes, shelter (in his tent or hotels) and drugs to satiate addictions. In fact, VAUGHAN had available for his victims “brown” (heroin or fentanyl) and “hard” (crack cocaine). At the time of his arrest on October 13, 2021 in the area of Mass. and Cass by the Boston Police Department’s Human Trafficking Unit, VAUGHAN had on his person approximately fifteen bags of crack cocaine – packaged to be distributed to drug users.

11. Additionally, VAUGHAN posted his sex trafficking victims on known sex-for-fee websites according to records of megapersonals.com and adultsearch.com advertisements.

VAUGHAN brought his victims to hotels, many of which he booked in person or online per records reviewed from Priceline.com. These hotels were in locations that included Boston, Chelsea, Saugus, the Cape, and Queens and Manhattan, New York. Once there, VAUGHAN had his victims perform “dates” both as in-calls at the hotel or out-calls at a location chosen by the client.¹² VAUGHAN also forced at least two of his victims to solicit themselves outdoors, by walking “the track” in areas such as Mass. and Cass in Boston, Broadway in Chelsea, and in and around Times Square in Manhattan. VAUGHAN set financial targets for his sex trafficking victims to meet and threatened them not to return to him if they did not meet those quotas on a given night. Proceeds of the commercial sex acts that VAUGHAN’s victims engaged in at his direction went to VAUGHAN, either in cash or sent to a CashApp account controlled by VAUGHAN. The investigation also revealed that dating back to at least 2019, VAUGHAN engaged in both physical and sexual violence on his victims to manipulate them and to assert power and control over them.

12. I am aware from my investigation that VAUGHAN, a/k/a “Ason,” calls himself “Ason the Pimp” and has a tattoo across his chest that states: “Pimp or Die.” Records received from Facebook show that dating back to at least 2013, VAUGHAN publishes self-created videos and rap songs, in both publicly available posts and private Facebook messages, in which he talks and sings about his work as a pimp and willingness to engage in violence with women. For example, per records received from Facebook, in some videos from September 2021, VAUGHAN repeats the phrase, “shit don’t stop ‘til a bitch get knocked.” Per records from Facebook, in a video from 2013, VAUGHAN states that he is “pimping everywhere I go” and that “N***** are sending my bitches hundreds of dollars in the morning.”

¹² An “in-call” is commercial sex where the customer, also known as a “john” or “date,” travels to the prostitute’s location, which is typically an apartment, hotel room, or brothel. An out-call is where the prostitute goes to the customer’s location. A “date” is a commonly used term to describe a sexual encounter exchanged for money.

13. VAUGHAN is 35 years old with twenty-two adult arraignments. Specifically, in February 2020, VAUGHAN was convicted of assault with a dangerous weapon and two counts of assault and battery with a dangerous weapon (all to wit: a firearm) and various firearm charges, including possession of a loaded firearm, after an arrest in September 2019. He received a two-year house of correction sentence with probation from and after his release from custody. He was on probation out of Chelsea District Court for the February 2020 conviction during his commission of the crimes that are the subject of the instant federal indictment. In fact, the phone number VAUGHAN provided to the probation department as his own was the same number attached to sex-for-fee advertisements depicting victims of VAUGHAN's sex trafficking.

14. VAUGHAN's other convictions include the following: aggravated assault and battery, assault and battery on a person over sixty and assault and battery on a police officer for which he served four years (Barnstable Superior, 2015); possession with intent to distribute heroin, assault and battery on a police officer and resisting arrest, for which he served one year (Chelsea District 2013); receiving stolen motor vehicle, for which he served six months (Boston Municipal Court, Central Division, 2011); possession with intent to distribute marijuana and bribery of a public employee for which he served six months of a two year sentence (Boston Municipal Court, Central Division, 2009); assault and battery on a public employee for which he served six months (Boston Municipal Court, Central Division, 2007); distribution and possession with intent to distribute a class B substance for which he served two years (Boston Municipal Court, Central Division, 2005); and, possession with intent to distribute a class B substance for which he served two years (Boston Municipal Court, Central Division 2005). VAUGHAN appears to be a career offender.

CONCLUSION

15. For the foregoing reasons and those to be offered at the detention hearing, VAUGHAN should be detained pending trial.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Za A', is written above a horizontal line.

Zachary Mitlitsky
Special Agent
Homeland Security Investigations